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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. ) Criminal No. 17 U.S. DIST. CT. MASS.  
J'CYNDA SALES, )  
Defendant ) Violation:  
 ) 18 U.S.C. § 656 - (Embezzlement  
 ) by a Bank Employee)  
 ) 18 U.S.C. § 982(a)(2) - (Forfeiture Allegations)  
)

INFORMATION

The U.S Attorney charges:

Introduction

At all times material to this Information:

1. Between in or about November 2015 and June 2016, Defendant J'CYNDA SALES ("SALES") was a teller at a Citizen's Bank branch located in Mattapan, Massachusetts ("the Bank").
2. On or about November 24, 2015, SALES met a customer of the Bank (the "Account Holder") when the Account Holder came to the Bank to deposit a check.
3. Between on or about November 28, 2015 and on or about May 23, 2016, SALES made forty-eight (48) unauthorized withdrawals totaling approximately \$172,551.00 from the Account Holder's account.
4. SALES deposited most of this money – approximately \$167,800 – into a checking account in the name of another individual. SALES and the other individual then withdrew and spent the money, through ATM and other cash withdrawals and point-of-sale debit card transactions.

Count One  
Embezzlement by a Bank Employee  
18 U.S.C. § 656

5. The U.S. Attorney realleges and incorporates by reference paragraphs 1 through 4 of this Information, and further charges that:

6. Beginning on or about November 28, 2015 and continuing through on or about May 23, 2016, in the District of Massachusetts and elsewhere, the defendant,

J'CYNDA SALES,

being an agent and employee of the Bank, a Federal Reserve member bank, a national bank and insured bank, did embezzle, abstract, purloin and willfully misapply money, funds and credits intrusted to the care and custody of the Bank, to wit: approximately \$172,551.00.

All in violation of 18 U.S.C. § 656 and 2.

**FORFEITURE ALLEGATION**  
18 U.S.C. § 982(a)(2)

The United States Attorney further charges that:

7. Upon conviction of the offense alleged in Count One of this Information, the defendant,

J'CYNDA SALES,

shall forfeit to the United States of America pursuant to 18 U.S.C. § 982(a)(2), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense.

The property to be forfeited includes, but is not limited to, \$172,551 in United States Currency, to be entered in the form of a forfeiture money judgment.

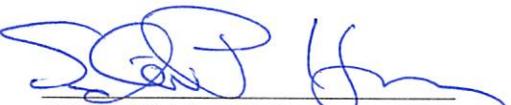
8. If any of the property described in Paragraph 7 above as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 18 U.S.C. § 982(b)(1), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 7.

All pursuant to Title 18, United States Code, Section 982(a)(2).

WILLIAM D. WEINREB  
ACTING U.S. ATTORNEY

BY:   
STEPHEN P. HEYMANN  
ASSISTANT U.S. ATTORNEY

Date: April 28, 2017